

Federal Defenders  
OF NEW YORK, INC.

Tamara Giwa  
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Southern District  
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June 3, 2024

VIA EMAIL AND ECF

The Honorable Cathy Seibel  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Application granted. Sentencing adjourned  
to 8/1/24 at 11:45 am.

SO ORDERED.

  
CATHY SEIBEL, U.S.D.J.

Dear Honorable Judge Seibel:

6/3/24

I write to request an adjournment of the sentencing scheduled for this Thursday, June 20, 2024, at 11:30 a.m. to Thursday, August 1, 2024, at 11:45 a.m.

The parties received the draft pre-sentence report (“PSR”) on the afternoon of Friday, May 31<sup>st</sup>. I have not had an opportunity review it with him with the assistance of an interpreter. I would like to do that before submitting my sentencing submission. Under the currently scheduling, my sentencing submission is due this Thursday, June 6<sup>th</sup>. Without the final PSR it is difficult to prepare my sentencing submission because I do not know, which, if any, objections I may wish to raise to the Court nor am I able to direct the Court to the information contained therein.

I have conferred with the government though Assistant United States Attorney Kaiya Arroyo who does not object to this request. I have also consulted with Mr. Flores-Ramirez who does not object to an adjournment. My understanding is that the Court has availability on August 1, 2024, at 11:45 a.m. and that date and time are convenient for the parties. Therefore, I am requesting that sentencing be moved to that date.

Thank you for your time and consideration.

Sincerely,



Elizabeth K. Quinn  
Counsel for Efrain Flores-Ramirez

cc: Kaiya Arroyo, AUSA